

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**April Parchman, as administrator ad  
litem of the estate of Jeffrey Parchman,  
deceased, individually and on behalf of all  
others similarly situated; and Ann  
Parchman, individually and on behalf of  
all others similarly situated,**

**Plaintiffs,**

**v.**

**SLM Corporation, Navient Corporation,  
Navient Solutions Inc. f/k/a Sallie Mae  
Inc., and Sallie Mae Bank,**

**Defendants.**

**Case No: 2:15-cv-02819-JTF-cgc  
JURY DEMAND  
Judge John T. Fowlkes, Jr.  
Magistrate Charmiane G. Claxton**

---

**PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION  
TO RESPOND TO DEFENDANTS' MOTION TO PRECLUDE  
CLASS CERTIFICATION AND STRIKE CLASS ALLEGATIONS**

---

Plaintiffs move for a 30 day extension to file their response to defendants' *Motion to Preclude Class Certification and Strike Class Allegations* (RE 140). Defendants' motion raises significant issues that will require a thorough response, and due to the holidays and a one week jury trial that is scheduled to begin on January 14, 2019 it will be difficult for counsel to devote appropriate time to the response until afterward. There are currently no other deadlines or hearings in place that would be affected, and defendants do not oppose the request. For these reasons, plaintiffs request an extension from December 31, 2018 to January 30, 2019.

Respectfully Submitted,

**THE HIGGINS FIRM, PLLC**

/s/ Benjamin J. Miller  
**BENJAMIN J. MILLER, BPR No. 25575**  
525 4th Ave. South  
Nashville, TN 37210  
(615) 353-0930  
[ben@higginsfirm.com](mailto:ben@higginsfirm.com)

*Attorneys for Plaintiffs*

**CERTIFICATE OF CONSULTATION AND CERTIFICATE OF SERVICE**

I hereby certify that on December 21, 2018 Lisa Simonetti confirmed via email that defendants do not oppose plaintiffs' request. I further certify that on December 21, 2018 this document was served via the Court's CM/ECF email notification system on:

Lisa M. Simonetti  
VEDDER PRICE (CA), LLP  
1925 Century Park E., Suite 1900  
Los Angeles, CA 90067  
(424) 204-7700  
[lsimonetti@vedderprice.com](mailto:lsimonetti@vedderprice.com)

Odell Horton, Jr.  
WYATT, TARRANT & COMBS, LLP  
1715 Aaron Brenner Dr.  
Suite 800  
Memphis, TN 38120-4367  
(901) 537-1000  
[ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)

Bryan K. Clark  
VEDDER PRICE, PC  
222 North LaSalle Street  
Chicago, IL 60601  
(312) 609-7810  
[bclark@vedderprice.com](mailto:bclark@vedderprice.com)

/s/ Benjamin J. Miller  
**BENJAMIN J. MILLER**